

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TAHIR MAHMOOD,	:	
	:	
	:	
Plaintiff,	:	11 Civ. 05345 (KBF) (THK)
	:	
v.	:	ECF CASE
	:	
RESEARCH IN MOTION LTD.,	:	
	:	
Defendant.	:	
	:	
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AFFIDAVIT OF CHRISTOPHER BUTLER

CHRISTOPHER BUTLER declares under penalty of perjury as follows:

1. I am the Office Manager at the Internet Archive, located in San Francisco, California. I make this declaration of my own personal knowledge.

2. The Internet Archive is a website that provides access to a digital library of Internet sites and other cultural artifacts in digital form. Like a paper library, we provide free access to researchers, historians, scholars, and the general public. The Internet Archive has partnered with and receives support from various well-known institutions and libraries, including the Library of Congress.

3. The Internet Archive has created a service known as the Wayback Machine. The Wayback Machine makes it possible to surf more than 150 billion pages stored in the Internet Archive's web archive. Visitors to the Wayback Machine can search archives by URL (i.e., a website address). If archived records for a URL are available, the visitor will be

presented with a list of available dates. The visitor may select one of those dates, and then begin surfing on an archived version of the Web. The links on the archived files, when served by the Wayback Machine, point to other archived files (whether HTML pages or images). If a visitor clicks on a link on an archived page, the Wayback Machine will serve the archived file with the closest available date to the page upon which the link appeared and was clicked.

4. The archived data made viewable and browseable by the Wayback Machine is compiled using software programs known as crawlers that surf the Web and automatically store copies of website files, preserving these files as they exist at the point of time of capture.


5. The Internet Archive assigns a URL on its site to the archived files in the format `http://web.archive.org/web/[Year in yyyy][Month in mm][Day in dd][Time code in hh:mm:ss]/[Archived URL]`. Thus, the Internet Archive URL `http://web.archive.org/web/19970126045828/http://www.archive.org/` would be the URL for the record of the Internet Archive home page HTML file (`http://www.archive.org/`) archived on January 26, 1997 at 4:58 a.m. and 28 seconds (1997/01/26 at 04:58:28). A web browser may be set such that a printout from it will display the URL of a web page in the printout's footer. The date assigned by the Internet Archive applies to the HTML file but not to image files linked therein. Thus images that appear on the printed page may not have been archived on the same date as the HTML file. Likewise, if a website is designed with "frames," the date assigned by the Internet Archive applies to the frameset as a whole, and not the individual pages within each frame.

6. Attached hereto as Exhibit A are true and accurate copies of printouts of the Internet Archive's records of the HTML files archived from the URLs and the dates specified in the footer of the printout.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: San Francisco, California
December 8, 2011


CHRISTOPHER BUTLER

State of California, County of San Francisco
Subscribed and sworn to (or affirmed)
before me on this 8th day of December, 20 11, by
Christopher Butler
proved to me on the basis of satisfactory evidence to be the
person(s) who appeared before me.
Signature  (Seal)

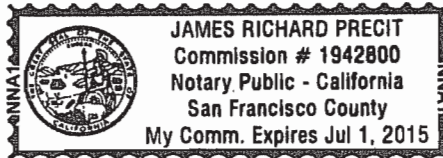


Exhibit A



Soon to be released is a book authored by BoffinBox that offers a detailed technical account of the wireless industry, its origins and history, development technologies including SMS, WAP, GPRS, Bluetooth, 3G, GPS, HSCSD, identifying their uses and describing their architecture.



Wireless Experience

Over the last decade, the people who are now part of BoffinBox were fully responsible for the following projects, systems, products and seminars.

Projects

Products

Seminars/Keynote Speeches

Projects/Systems

RAM Mobile Data

Designed and developed a two-way wireless messaging product that worked over a Mobitex network (analogous to GPRS) using a hand held device called an Infotac.

This product consisted of a gateway that allowed users to receive e-mails on their Infotac and respond with canned messages.

This concept was further developed by RIM (Research in Motion) with a hand held device called 'Blackberry'

Aided Motorola's wireless division to test and correct their Mobitex protocol stack and API's.

Psion

Developed a prototype e-mail gateway and client for Psion's 3a series PDA that provided dial-up access to both Microsoft Mail and Lotus cc:Mail.

Microsoft

Established messaging (e-mail), workgroup, workflow and groupware support infrastructure for Microsoft United Kingdom.

This required an in-depth working knowledge of technologies such as X.400, X.500, SMTP, TCP/IP, X.25, LAN's, WAN's and Packet Radio Networks on platforms as diverse as Windows NT, Apple Macintosh, UNIX and MVS.

Provided technical consultancy in this area to blue chip corporations through Microsoft Consulting.

Vodafone, BTCellnet, Orange and One-to-One

Ratified networks SMS dial-up access protocols.

Developed and released to market a standalone dial-up product, namely Mobile Messenger that received an 89% rating in 'What Cellphone' magazine which is capable of sending messages to all four networks.

Designed and released to market the first product in the world that forwarded Internet e-mail (POP3) to mobile phones using Short Messaging.

www.crunch.co.uk

Provided expertise required for integration of web based system into GPRS for delivery of real time music. Enabling entry on pilot projects in wireless networks.

Sharp

Designed and developed a database gateway and client for use on Sharp's ZR series of PDA's that enabled synchronisation of data over both dial-up and wireless networks.

BT, BTNA (British Telecom North America), Syncordia, Concert – U.S.A

Designed and implemented Syncordia and Concert's global messaging (e-mail) system. This included providing inter-connectivity to a host of systems through terrestrial, wireless and satellite links.

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